

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICROSOFT CORPORATION, a)	
Washington corporation,)	
)	CASE NO. C10-1823-JLR
Plaintiff,)	
)	NOTICE OF NONPARTY VTECH
v.)	COMMUNICATIONS, INC.'S JOINDER IN
)	DEFENDANTS' MOTION TO SEAL
MOTOROLA, INC., MOTOROLA)	DOCUMENTS AND EXCLUDE
MOBILITY LLC, and GENERAL)	UNAUTHORIZED PERSONS FROM THE
INSTRUMENT CORPORATION,)	COURTROOM
)	
Defendants.)	
)	

In accordance with the Court's statement during the *Daubert* hearing on October 18, 2012, VTech Communications, Inc. ("VTech") hereby joins Motorola's Motion to Seal Documents and Trial Testimony and Exclude Unauthorized Persons From the Courtroom During Testimony Regarding Trade Secrets (Dkt. No. 495) as it pertains to the VTech-Motorola license and testimony regarding the terms of that license.

Motorola has stated that it anticipates that the parties will seek to elicit testimony regarding the terms of various licenses between Motorola and third parties, possibly including the license between VTech and Motorola. *See* Dkt. No. 495 at 16. As Motorola has explained

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PERSONS FROM THE COURTROOM - 1
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#869705 v1 / 01318-002

Law Offices
KARR TUTTLE CAMPBELL
A Professional Service Corporation
1201 Third Avenue, Suite 2900, Seattle, Washington 98101-3028
Telephone (206) 223-1313, Facsimile (206) 682-7100

(*id.*), such testimony would necessarily be about “information that plainly falls within the definition of ‘trade secrets.’” *See In re Elec. Arts*, 298 F. App’x at 569-70. For the same reasons the VTech-Motorola license should be sealed, unauthorized persons should be excluded from the courtroom throughout testimony regarding the terms of that license.

In support of this notice, VTech offers the Declaration of Kenton Erwin, submitted concurrently herewith.

RESPECTFULLY SUBMITTED this 1st day of November, 2012.

KARR TUTTLE CAMPBELL

s/ Walter E. Barton

Walter E. Barton, WSBA #26408

Bruce E. Larson, WSBA #06209

1201 Third Ave., Suite 2900

Seattle, WA 98101

Telephone: (206) 223-1313

Fax: (206) 682-7100

Attorneys for VTech Communications, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2012, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Western District of Washington by using the appellate CM/ECF system.

I certify that for all parties in the case who are registered as CM/ECF users, service will be accomplished by the CM/ECF System.

Dated: November 1, 2012.

KARR TUTTLE CAMPBELL

s/ Walter E. Barton

Walter E. Barton

For VTech Communications, Inc.

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